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October 28, 2024

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Request for Extension of Deadlines – Henry v. Major League Baseball Advanced Media, L.P. and Golland v. Major League Baseball Advanced Media, L.P., Case Nos. 1:24-cv-01446-GHW-GWG & 1:24-cv-06270-GHW-GWG

Dear Judge Gorenstein,

Pursuant to Rule 1.E of the Court’s Individual Practices, the Parties in two pending putative class action lawsuits against Major League Baseball Advanced Media, L.P. (“MLBAM”) respectfully request an extension to the deadlines currently set forth in the Court’s October 8, 2024, order in the above-referenced cases. Specifically, the Parties seek to amend the briefing schedule to allow plaintiffs in both cases to file amended complaints. The *Henry* plaintiff seeks to amend his complaint to add another named plaintiff, to expand the proposed class to include subscribers to *MLB.com*, and to address some pleading issues identified in MLBAM’s previous motion to dismiss. The *Golland* plaintiffs also intend to amend their complaint. MLBAM does not oppose the plaintiffs’ requests to amend their complaints, subject to an agreed extension of the current motion to dismiss briefing schedule.

Based on the foregoing, the Parties respectfully request an extension of the deadlines for the filing of the plaintiffs’ amended complaints and MLBAM’s subsequent responsive pleadings. This is the first request for an extension of these deadlines. The proposed new deadlines are:

- **Plaintiffs' Amended Complaints:** November 21, 2024
- **Defendants' Responsive Pleadings:** December 19, 2024

In addition, we respectfully note that this extension should not affect any other scheduled deadlines and aligns with the Court's guidance to consolidate the briefing schedule and focus on efficient case management. Unless otherwise directed by the Court, MLBAM plans to file a single identical memorandum in both cases in support of any Rule 12 motion it files, and MLBAM does not intend to file an additional pre-motion letter pursuant to Rule 2.A of the Court's Individual Practices unless a motion MLBAM files will be based on grounds not raised in its earlier letters.

Thank you for considering this request. Please let us know if further information is required.

Respectfully submitted,

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